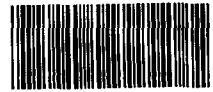


PILKO & ASSOCIATES, INC.

Business / Environmental / Real Estate Consultants



SDMS Doc ID 164883

6351 OWENSMOUTH AVENUE SUITE 202
WOODLAND HILLS, CALIFORNIA 91367
(818) 716 9311
FAX (818) 716 9450

ENVIRONMENTAL RISK ASSESSMENT

OF

DICO OIL COMPANY

SIGNAL HILL, CALIFORNIA

Prepared For

DICO OIL COMPANY

For PILKO & ASSOCIATES, INC.

A. J. Aluknavich

Lloyd J. Whitfill

May, 1990
(50.0486)

POOR LEGIBILITY

ONE OR MORE PAGES IN THIS DOCUMENT ARE DIFFICULT TO READ
DUE TO THE QUALITY OF THE ORIGINAL

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A.

INTRODUCTION

★ [Pilko & Associates, Inc. performed an Environmental Risk Assessment during April and May, 1990, to determine the general environmental condition of the Dico Oil Company waste oil reclamation facility in Signal Hill, California, in support of an application for Environmental Impairment Liability Insurance (EIL).

The plant is located at 1845 East Willow Street in the city of Signal Hill, Los Angeles County, California 90806, on land leased from Mrs. Bianca Denny. The site was developed between 1952 and 1953, and the facility was acquired by the present owner in 1960. The facility processes (reclaims) used oil. It is the only facility owned and operated by the Dico Oil Company. Dico maintains office facilities at 2700 Rose Avenue, Suite K, Signal Hill.

This assessment focuses on identifying and evaluating gradual and sudden & accidental environmental risks and liabilities associated with the operation of the facility at Signal Hill. A variety of information sources such as regulations, industry standards and guidelines are used while performing an ERA; however, this risk assessment is not intended to serve as a rigorous environmental compliance audit.

The facility was visited and the following people were interviewed during the course of this risk assessment.

Dico Oil Company

- o Richard A. Cowan - Owner/operator
- o Matthew F. Stewart - Associate

Regional Water Quality Control Board

- o J. Ross - Representative

California Department of Health Services

- o Suwuan Sonkprasha - Hazard Materials Specialist

B.

SUMMARY

GENERAL

This assessment found a small oil reclamation operation operated by the owner of the company with the help of three full-time employees. The company owner has approximately 40 years of experience in handling, moving and reclaiming used oil. He has owned and operated the facility at 1845 East Willow for the past 30 years.

The Dico Oil Company is situated on approximately one-half acre in the city of Signal Hill, Los Angeles County. An office is located at 2700 Rose Avenue, Signal Hill. The site is primarily industrial; however, there are two residences within 600 yards of the east property line. To the south and west is vacant land with producing oil wells. Light industrial operations and office buildings occupy the properties on the north and east boundaries.

The company processes approximately two million gallons of waste oil annually and also produces marine fuel, asphalt cutter stocks and boiler fuel. The facility operates under Interim Status Permit EPA I.D. No. CAD980737076 as a generator and storer of hazardous waste.

Solid hazardous waste generated at the facility consists of a very small quantity of oil and gravel picked up as the result of truck drips on the concrete loading pad. Solids removed from the waste oil are stored as bottom sediment in the storage tanks. The means of disposal of these materials has not been established because tank bottoms have not been collected for disposal in a very long time.

Liquid hazardous waste consists of approximately 3,500 gallons per year of oily water produced in the dehydration process. This material is picked up by Nelco Oil Company, EPA I.D. No. CAD008352870, and transported to a facility in National City, California, where it is treated and rendered suitable for discharge into a publicly owned treatment works (POTW).

The waste oil is stored and processed in six storage tanks situated inside a spill containment dike. Minimal air emissions are generated at the facility. The company has obtained air permits for two tanks has applied for permits to operate the remaining tanks from the South Coast Air Quality Management District. The applications are pending.

Two underground storage tanks were removed in June, 1988. Some oily soil (10 to 12 cubic yards), which was excavated from under one of these tanks, tested negative for heavy metals and is stockpiled onsite. In February, 1990, the California Department of Health Services (DHS) tested the material, found PCB contamination, and issued a Notice of Violation to Dico for storing this material onsite without a permit. The outcome and eventual disposal of this material are on hold, pending the analytical results of a series of tests.

Existing fire, safety and security measures appear to be effective.

RISK ASSESSMENT RATINGS

Gradual

The Dico facility is considered to represent a slightly above average exposure for gradual occurrences because 1) PCB-contaminated soil removed from under a leaking storage tank is stockpiled onsite, 2) employees are trained to handle the materials stored onsite, 3) one employee lives on the site, and 4) the water table is 200 to 300 feet below the surface.

Sudden & Accidental

The Dico facility is considered to represent an average exposure for sudden & accidental occurrences because 1) the storage tanks are located in a diked area, 2) materials are transferred by pump, pipeline and loading hose, 3) a written Spill Contingency Plan is in-place, 4) there are residential areas and an elementary school within one-half mile of the site, and 5) the site is located in an active earthquake zone.

DICO OIL COMPANY

FACILITY OVERVIEW

<u>Location</u>	<u>Risk Ratings</u>	<u>Issues of Concern</u>	<u>Mitigating Factors</u>
Signal Hill, CA Zip Code: 90806 EPA ID#: CAD980737076	<u>Gradual:</u> Slightly above average	<ul style="list-style-type: none"> o Stores and processes hazardous materials o PCB-contaminated soil stored onsite o Generates hazardous waste 	<ul style="list-style-type: none"> o Employees are trained to handle materials stored onsite o Employee lives onsite o Water table is 200 to 300 feet below ground surface
	<u>Sudden & Accidental:</u> Average	<ul style="list-style-type: none"> o Stores and processes hazardous materials o Located in an earthquake zone o Residences and elementary school are within one-half mile 	<ul style="list-style-type: none"> o Secondary containment provided for storage tanks o Materials moved by pump, loading hose and pipeline o Written Spill Contingency Plan in-place

RECOMMENDATIONS

The following recommendations, with suggested time frames for completion, are made as a condition of the risk ratings assigned.

- 90-1 Determine the extent of the contamination in the stockpiled soil and obtain permits for its timely disposal. (3 months)
- 90-2 Conduct an inspection of the storage tanks on a regular basis to determine the integrity of the lower portions of the tank walls and bottoms. (Periodically)

C.

ORGANIZATIONAL - ENVIRONMENTAL AFFAIRS MANAGEMENT

The responsibility for environmental affairs management rests with the owner/operator of the company. The owner also handles the day-to-day environmental concerns. The owner has worked in, or has owned and operated, oil reclamation companies for the past 40 years, and has operated the Dico Oil Company since 1960.

A Spill Contingency and Emergency Plan has been developed and implemented. This plan will be reviewed annually and amended as necessary.

The facility was inspected by the California Department of Health Services (DHS) in January, 1990. The DHS issued nine Notices of Violations and assessed penalties totalling \$62,300. Dico has requested a formal hearing to challenge the Order and Complaint (Attachment 1, DHS Corrective Action Order and Complaint for Penalty). The primary concern is the disposal of the contaminated soil on the property. This soil was tested for total hydrocarbons and heavy metals when it was identified below the underground tank during removal, but the soil was not tested for PCBs at that time. Efforts are presently underway to obtain DHS approval to dispose of this material.

In 1988, the site was placed on the DHS Screening Site Inspection list as a medium priority.

D.

SIGNAL HILL, CALIFORNIA, FACILITY ASSESSMENT

DESCRIPTION OF FACILITY

The Dico Oil Company waste oil recovery plant is located at 1845 East Willow Street, Signal Hill, California. The administrative office is located at 2700 Rose Avenue, Suite K, Signal Hill, approximately one-half block from the plant site. The present zoning classification for the site is "commercial town center," which allows for concentrated commercial enterprises and retail stores with a height limit of four stories or 70 feet. The property is leased from Mrs. Bianca Denny, 2627 Gardenia Avenue, Signal Hill, California. The land adjacent to the west boundary and across Willow Street to the south is vacant except for some producing oil wells. There are two residences adjacent to the east boundary, and to the north is a small office complex in which the Dico office is located (Attachment 2, Site Plan; and Attachment 3, USGS Topographic Map).

The plant is located on approximately one-half acre in the city of Signal Hill, in the southern portion of the Los Angeles Basin. The facility consists of six carbon steel aboveground storage tanks, two small buildings (less than 200 square feet each) and a truck loading/unloading pad. The tanks and the truck loading pad are diked for spill containment. Surface stormwater runoff flows into city storm drains that discharge into the Pacific Ocean.

The area receives an annual average rainfall of approximately 10 to 15 inches and is generally considered to have an arid climate.

The plant lies in the general vicinity of the Newport-Inglewood Fault, which was the site of a major earthquake that hit Long Beach, California, in 1933, causing extensive property damage and some loss of lives. There has not been any significant seismic activity along this fault in the last few years.

SOIL AND GROUNDWATER EVALUATION

The city of Signal Hill is situated in the Central Basin Pressure Area of the Coastal Plain of Los Angeles County. Recent Alluvium covers most of the Central Basin Pressure Area and reaches a probable depth of 200 feet near the city of Bellflower. It contains a semi-perched aquifer, the Bellflower Aquiclude and the Gaspera Aquifer. The semi-perched aquifer is

defined as the area where sand and gravel overlaying the Bellflower Aquiclude are more than 20 feet thick. Although the aquifer can be defined on well logs, water levels in wells indicate that it contains little or no water. However, the Cherry Hill Fault, which is located within three miles of Signal Hill, may allow water from the shallow aquifers to percolate down into the deep San Pedro Formation. There are some domestic water wells in the area that draw from the San Pedro Formation. Other than the stockpiled soil, there is no known soil contamination onsite. There are producing oil wells on adjacent property, but there are no known PCBs or other contamination from these sources.

OPERATIONS

Dico Oil Company converts waste oil into a useable, sellable product. The company receives approximately two million barrels annually of various waste oils and produces approximately two million gallons per year of finished product in reclaimed oil by a process of blending and dehydrating. The dehydration is accomplished by gravity separation in tanks. The facility has the capability for thermal dehydration, but it is not being used at the present time.

Incoming used oil, oils from service stations, crude oil and slop oils are delivered by common carrier tank trucks. The load documentation and hauler authorization are checked by Dico employees. A sample is taken from each load and several tests are performed, including bottom sediment, water, and API gravity. Other tests, such as flash point and pH, are conducted if solvents are suspected due to odor or appearance. When testing is complete and the load meets specifications, it is transferred into the appropriate tank.

The company has three full-time and one part-time employees, and operates from 8 a.m. to 4:30 p.m., five days a week.

Six carbon steel tanks, ranging in size from 8,400 gallons to 42,000 gallons, are used to store and process the oil. The tanks are interconnected so that any tank can serve as a storage tank or a gravity separator. Blending is accomplished by the selective transfer of materials from tank to tank. Mixing is accomplished by pumping the material in and out of the same tank. There is a natural gas-fired water heater connected to internal coils in two of the tanks to allow for thermal dehydration, and two 1,000-gallon fresh water storage tanks that can also be used for firefighting if necessary.

Finished products, such as asphalt-blending compounds, cutter stock for high viscosity oils and marine fuels, and diesel and boiler fuel, are loaded directly into transport tank trucks and

shipped to end markets. Dico does not transport any materials, waste oil or end products in its own vehicles.

The tanks are situated inside a bermed area. The berms are designed to contain the contents of the largest tank plus ten percent; however, the berms are eroded in some areas. Calculations performed in 1988 by Jack K. Bryant & Associates indicate the volume of the diked area is adequate to contain the volume of the largest tank with more than 10 percent reserve.

Electricity is purchased from the Southern California Edison Company. Natural gas is supplied by the city of Long Beach.

SOLID AND HAZARDOUS WASTE MANAGEMENT

Dico is permitted (Interim Status) to operate as a treatment, storage and disposal (TSD) facility, RCRA Exempt Recycler under EPA I.D. No. CAD980737076 (Attachment 4, Interim Status Document, March 29, 1989).

The facility does not routinely generate significant quantities of solid hazardous waste. Small drips of waste oil on the loading pad are cleaned up by absorption with sand and sweeping compound. These sweepings are stored in a 30-gallon plastic container. To date, none of this waste material has been shipped offsite for disposal. There was one container approximately three-fourths full onsite at the time of the visit.

Approximately two cubic yards of plant trash is generated each month. This is picked up by the city of Signal Hill Rubbish Collection Department and disposed of in a local landfill.

In June, 1988, two 10,000-gallon underground tanks used to store wastewater were removed. The resulting excavation was approximately nine feet deep. Chemical analysis of the soil indicated a relatively high concentration of petroleum hydrocarbons (945 micrograms per gram (ug/g) of dry soil. The analysis also showed a very rapid decrease in total hydrocarbon content to a low level of 27 ug/g of dry soil at a depth of 12.5 feet. The oily soil was excavated and stored on the property (Attachment 5, Analysis Results Report from Global Geochemistry Corporation). Pilko & Associates recommends determining the extent of the contamination in the stockpiled soil and obtaining permits for its timely disposal.

Land farming on the site of the oily soil was initiated on August 17, 1989, but this operation was shut down later in the same month by a representative of the Los Angeles office of the Regional Water Quality Control Board (RWQCB). As a result of

a statement to Jack K. Bryant & Associates by the RWQCB representative that some of the oily soil could be used to build up the tank farm berm, some soil was used for that purpose. All of the oily soil remains on the property.

In the dehydration process, a small quantity of solids precipitates from the waste oil. This material settles to the bottom of the tank where it has been allowed to accumulate for many years. At some future date, it will become necessary to dispose of this hazardous waste.

WATER MANAGEMENT

Approximately 3,500 gallons per year of liquid hazardous waste generated in the dehydration process are picked up by Nelco Oil Refining Corporation, 600 West 12th Street, National City, California, EPA I.D. No. CAD008352890, and transported to its facility in National City for treatment and disposal (Attachment 6, Typical Hazardous Waste Manifest).

A small amount of water for domestic use is purchased from the city of Signal Hill which, in turn, purchases water from the city of Long Beach. The water comes primarily from the Colorado River, but the city of Long Beach uses some water from local wells. No water is used in the operations process. There are no sewer connections or surface drains on the property. The only wastewater generated in the process is water that is entrained in the waste oil when it is received.

INACTIVE WASTE SITE IDENTIFICATION

No known inactive waste sites are identified onsite. Two 10,000-gallon tanks used for wastewater storage in past operations were removed in June, 1988. Oil-contaminated soil from under one of these tanks is stored onsite awaiting approval for disposal.

SPILL CONTAINMENT AND CONTINGENCY PLANNING

In October, 1989, a Spill Contingency Plan was developed for the site by J. K. Bryant & Associates Inc., a consulting firm. This plan describes emergency actions to be taken in the event of a spill and lists equipment available to contain spills (Attachment 7, Spill Contingency Plan).

Waste oils are stored and processed in six carbon steel aboveground storage tanks. There are three 21,000-gallon tanks, one 42,000-gallon tank, one 31,500-gallon tank, and one 8,400-gallon tank. Four of the tanks are of riveted

construction and the others are welded. In addition, there are two 1,000-gallon, clean water circulation/storage tanks. There are no records available on the inspection and testing of the oil storage tanks. Pilko & Associates recommends inspecting these tanks periodically to ensure the integrity of the tank walls and bottoms.

Hazardous material storage does not appear to represent a serious environmental exposure because the storage area is equipped with secondary containment.

AIR

The materials stored and processed at the Dico facility are of very low volatility and air emissions are negligible. No emissions control equipment is required. Air permit applications have been submitted and are pending. A site inspection by the Air Quality Management District (AQMD) in November, 1989, did not result in any Notice of Violation. There have been no reported complaints from neighbors regarding odors or emissions from the facility.

OTHER AREAS

Asbestos

No asbestos-containing materials are identified onsite. One insulated storage tank is in use. The insulation is metal-clad and the owner stated that the insulation does not contain asbestos.

Polychlorinated Biphenyls (PCBs)

No PCB-contaminated equipment is identified as being in use or in storage at the facility. However, soil excavated during underground tank removal is contaminated with PCBs and is presently stored onsite.

Safety, Security and Fire Protection

The owner conducts the safety training for the employees. Training in hazardous waste safety and handling was conducted recently. Safety equipment, including eye shields and gloves, is available for employees. The facility is enclosed by a six-foot chain-link fence, and one employee lives in a trailer on the property.

Fire protection is provided by the Los Angeles County Fire Department. The nearest station is minutes away. Hand-held fire extinguishers are located inside the facility and employees are instructed in their use.

Housekeeping

Housekeeping throughout the site is generally good.

Regulatory Agency Contact

An official of the RWQCB stated that Dico is not a major concern of the department. He denied that he had suggested applying the oil-contaminated soil on the spill containment berm.

Representatives from the DHS would not comment on company operations or environmental performance as a matter of policy.

E.

REPORT LIMITATIONS

The scope of this report is limited to the matters expressly covered. This report is prepared for the sole benefit of **Dico Oil Company**, and may not be relied upon by any other person or entity without the written authorization of Pilko & Associates, Inc.

In preparing this report, Pilko & Associates, Inc. has relied on information derived from secondary sources and personal interviews. Except as set forth in this report, Pilko & Associates, Inc. has made no independent investigation as to the accuracy or completeness of the information derived from the secondary sources and personal interviews and has assumed that such information was accurate and complete.

All recommendations, findings, and conclusions stated in this report are based upon facts and circumstances as they existed at the time that this report was prepared (e.g., federal, state and local laws, rules, regulations, market conditions, energy costs, wage rates, political climate, and other matters that Pilko & Associates, Inc. deemed relevant). A change in any fact or circumstance upon which this report is based may adversely affect the recommendations, findings, and conclusions expressed in this report.

NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE SHALL APPLY. PILKO & ASSOCIATES, INC. MAKES NO REPRESENTATION OR WARRANTY THAT THE IMPLEMENTATION OR USE OF THE RECOMMENDATIONS, FINDINGS, OR CONCLUSIONS OF THIS REPORT WILL RESULT IN COMPLIANCE WITH APPLICABLE LAW.

F.

ATTACHMENTS

1. DHS Corrective Action Order and Complaint
for Penalty
2. Site Plan
3. USGS Topographic Map
4. Interim Status Document, March 29, 1989
5. Analysis Results Report from Global
Geochemistry Corporation
6. Typical Hazardous Waste Manifest
7. Spill Contingency Plan

LETTER OF TRANSMITTAL

DATE 4-03-90

FROM DICO OIL COMPANY
2700 ROSE AVE. #K
SIGNAL HILL, CA. 90805

TO Riko Associates
6351 Owensmouth Suite 202
Woodland Hills, CA 91367

RE: Copy of Violations att: Lloyd J. Whitfield

PAGES 10 - this page included

STATE OF CALIFORNIA
HEALTH AND WELFARE AGENCY
DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM

In the Matter of:) Docket HWCA 89/90-232
)
Dico Oil Company, Inc.) CORRECTIVE ACTION ORDER AND
1845 East Willow Street) COMPLAINT FOR PENALTY
Signal Hill, California 90806)
)
Respondent.) Health and Safety Code
Sections 25187 and 25189.2

INTRODUCTION

1.1. Parties. The State Department of Health Services (Department) issues this Corrective Action Order and Complaint for Penalty (Order and Complaint) to Dico Oil Company, Inc. (Respondent), a California corporation.

1.2. Facility. Respondent generates, handles, treats, stores, and/or disposes of hazardous waste at the following location: 1845 East Willow Street, Signal Hill, California (Facility).

1.3. Permit/Interim Status. The Department authorized Respondent to manage hazardous waste by Interim Status Document dated March 29, 1989.

1.4. Jurisdiction. Section 25187 of the Health and Safety Code (HSC) authorizes the Department to issue an Order when the Department determines that any person has violated, is violating, or threatens to violate specified provisions of the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto. HSC section 25189.2 authorizes the Department to issue a Complaint and to impose a penalty on persons who commit specified acts, pursuant to the procedures set forth in HSC section 25189.3.

1
2
3 DETERMINATION OF VIOLATIONS

4 2. The Department has determined that the Respondent has violated, is
5 violating, or threatens to violate HSC section 25189.2 and other specified
6 provisions as follows:

7 2.1. The Respondent violated HSC section 25189.5(a), in that on or about
8 September 26, 1989, the Respondent disposed of hazardous waste at its Facility
9 without having a permit or authorization from the Department to do so, to wit:
10 soil contaminated with excessive levels of polychlorinated biphenyl was disposed
11 of at the west side of the driveway on-site and also added to the berm
12 surrounding the tank area on-site.

13 2.2. The Respondent violated HSC section 25250.19, in that from
14 January 1988 to September 26, 1989, the Respondent falsely certified that
15 recycled oil which it sold and transported from its Facility complied with the
16 standard of purity for lead as set forth in HSC section 25050.1(c).

17 2.3. The Respondent violated HSC section 25198(a), in that from
18 January 1, 1988, to September 26, 1989, the Respondent failed to use or employ a
19 laboratory certified by the Department to perform the analysis of its recycled
20 oil required by HSC section 25250.1(c).

21 2.4. The Respondent violated title 22, California Code of Regulations
22 (Cal. Code Regs.), section 67003 and its Interim Status Document, in that since
23 March 29, 1989, the Respondent has not had adequate financial assurance for
24 closure of the Facility.

25 2.5. The Respondent violated title 22, Cal. Code Regs., section 67027 and
26 its Interim Status Document, in that since March 29, 1989, the Respondent has
27 not had financial liability coverage for sudden accidental occurrences at the
Facility.

1 2.6. The Respondent violated title 22, Cal. Code Regs., section 66493(a),
2 in that, the Respondent failed to prepare and submit a single copy of a Biennial
OK 3 Report to the Department by March 1 of the numbered years 1986 and 1988.

4 2.7. The Respondent violated title 22, Cal. Code Regs., section
5 66508(a)(3), in that on or about September 26, 1989, Respondent failed to label
OK 6 or mark clearly 14 containers of waste oil drippings with the words,
7 "Hazardous Waste", and the additional language required under subsection (c) of
8 this section.

9 2.8. The Respondent violated title 22, Cal. Code Regs., section 67164(a),
10 in that on or about September 26, 1989, the Respondent failed to furnish or make
OK 11 available for inspection its closure plan when requested to do so by a
12 representative of the Department.

13 2.9. The Respondent violated title 22, Cal. Code Regs., section 67143(e),
14 in that on or about September 26, 1989, the Respondent failed to immediately
OK 15 amend its contingency plan when the emergency coordinator for the Facility left
16 the employ of Respondent.

17
18 SCHEDULE FOR COMPLIANCE
19

20 3. Based on the foregoing DETERMINATION OF VIOLATIONS, IT IS HEREBY
21 ORDERED THAT:

22 3.1.1. Within 60 days of the effective date of this Order, Respondent
OK 23 shall submit a plan characterizing the vertical and horizontal extent of soil
24 contamination at the Facility. This plan shall be submitted for Departmental
25 review, and no work to remediate the facility shall start without prior approval
26 of the plan.
27

1 3.1.2. Immediately upon the effective date of this Order, the Respondent
2 shall cease certifying oil as "recycled oil" unless it meets the required
3 standards set forth in HSC 25250.1. Lab analyses of "recycled oil" should be
4 attached to associated shipping documents (i.e. certification forms and bills of
5 lading) and copies kept on-site.

6 3.1.3. Immediately upon the effective date of this Order, the Respondent
7 shall utilize a laboratory that is certified and accredited by the Department to
8 analyze its recycled oil prior to shipping it off-site.

9 3.1.4. Within thirty (30) days of the effective date of this Order, the
10 Respondent shall provide documentation to the Department of financial assurance
11 for closure in the amount of \$63,042 as required by title 22, Cal. Code Regs.,
12 section 67003.

13 3.1.5. Within thirty (30) days of the effective date of this Order, the
14 Respondent shall provide documentation to the Department of liability coverage
15 for sudden accidental occurrences in the amount of \$1 million per occurrence per
16 facility with a \$2 million annual aggregate as required by title 22,
17 Cal. Code Regs., section 67027.

18 3.1.6. Immediately upon the effective date of this Order, the Respondent
19 shall submit to the Department Biennial Reports that were due in March of 1986
20 and 1988. A copy of these reports shall be kept at the facility.

21 3.2. Submittals. All submittals from Respondent pursuant to this Order
22 shall be sent to:

23
24 John J. Kearns
25 Regional Administrator
26 Department of Health Services
27 Toxic Substances Control Program
Region 4
245 West Broadway, Suite 350
Long Beach, CA 90802

1 Submittals concerning 3.1.3. and 3.1.4. shall be sent to:

2 Lucille van Ommering, Chief
3 Financial Responsibility Unit
4 714/744 "P" Street
5 P.O. Box 942732
6 Sacramento, CA 94234-7320

7 3.3. Communications. All approvals and decisions of the Department made
8 regarding submittals and notifications will be communicated to Respondent in
9 writing by the Regional Administrator, Toxic Substances Control Program,
10 Department of Health Services, or his/her designee. No informal advice,
11 guidance, suggestions, or comments by the Department regarding reports, plans,
12 specifications, schedules, or any other writings by Respondent shall be
13 construed to relieve Respondent of the obligation to obtain such formal
14 approvals as may be required.

15 3.4. Department Review and Approval. If the Department determines that
16 any report, plan, schedule, or other document submitted for approval pursuant to
17 this Order fails to comply with the Corrective Action Order or fails to protect
18 public health or safety or the environment, the Department may:

19 a. Modify the document as deemed necessary and approve the document
20 as modified or

21 b. Return the document to Respondent with recommended changes and a
22 date by which Respondent must submit to the Department a revised document
23 incorporating the recommended changes.

24 3.5. Compliance with Applicable Laws: Respondent shall carry out this
25 Order in compliance with all local, State, and federal requirements, including
26 but not limited to requirements to obtain permits and to assure worker safety.

27 3.6. Endangerment during Implementation: In the event that the Department
determines that any circumstances or activity (whether or not pursued in
compliance with this Order) are creating an imminent or substantial endangerment

1 to the health or welfare of people on the site or in the surrounding area or to
2 the environment, the Department may order Respondent to stop further
3 implementation of this Order for such period of time as needed to abate the
4 endangerment. Any deadline in this Order directly affected by a Stop Work Order
5 under this section shall be extended for the term of the Stop Work Order.

6 3.7. Liability: Nothing in this Order shall constitute or be construed as
7 a satisfaction or release from liability for any conditions or claims arising as
8 a result of past, current, or future operations of Respondent. Notwithstanding
9 compliance with the terms of this Order, Respondent may be required to take
10 further actions as are necessary to protect public health or welfare or the
11 environment.

12 3.8. Site Access: Access to the site shall be provided at all reasonable
13 times to employees, contractors, and consultants of the Department, and any
14 agency having jurisdiction. Nothing in this Order is intended to limit in any
15 way the right of entry or inspection that any agency may otherwise have by
16 operation of any law. The Department and its authorized representatives shall
17 have the authority to enter and move freely about all property at the Site at
18 all reasonable times for purposes including but not limited to: inspecting
19 records, operating logs, and contracts relating to the Site; reviewing the
20 progress of Respondent in carrying out the terms of this Order; and conducting
21 such tests as the Department may deem necessary. Respondent shall permit such
22 persons to inspect and copy all records, documents, and other writings,
23 including all sampling and monitoring data, in any way pertaining to work
24 undertaken pursuant to this Order.

25 3.9. Sampling, Data, and Document Availability. Respondent shall permit
26 the Department and its authorized representatives to inspect and copy all
27 sampling, testing, monitoring, and other data generated by Respondent or on

1 Respondent's behalf in any way pertaining to work undertaken pursuant to this
2 Order. Respondent shall allow the Department and its authorized representatives
3 to take duplicates of any samples collected by Respondent pursuant to this
4 Order. Respondent shall maintain a central depository of the data, reports, and
5 other documents prepared pursuant to this Order. All such data, reports, and
6 other documents shall be preserved by Respondent for a minimum of six years
7 after the conclusion of all activities under this Order. If the Department
8 requests that some or all of these documents be preserved for a longer period of
9 time, Respondent shall either comply with that request, deliver the documents to
10 the Department, or permit the Department to copy the documents prior to
11 destruction. Respondent shall notify the Department in writing at least six
12 months prior to destroying any documents prepared pursuant to this Order.

13 3.10. Government Liabilities: The State of California shall not be liable
14 for injuries or damages to persons or property resulting from acts or omissions
15 by Respondent or related parties specified in paragraph 3.16 in carrying out
16 activities pursuant to this Order, nor shall the State of California be held as
17 a party to any contract entered into by Respondent or its agents in carrying out
18 activities pursuant to the Order.

19 3.11. Additional Enforcement Actions: By issuance of this Order, the
20 Department does not waive the right to take further enforcement actions.

21 3.12. Incorporation of Plans and Reports. All plans, schedules, and
22 reports that require Department approval and are submitted by Respondent
23 pursuant to this Order are incorporated in this Order upon approval by the
24 Department.

25 3.13. Extension Request: If Respondent is unable to perform any activity
26 or submit any document within the time required under this Order, the Respondent
27

1 may, prior to expiration of the time, request an extension of time in writing.
2 The extension request shall include a justification for the delay.

3 3.14. Extension Approvals: If the Department determines that good cause
4 exists for an extension, it will grant the request and specify in writing a new
5 compliance schedule.

6 3.15. Penalties for Noncompliance: Failure to comply with the terms of
7 this Order may also subject Respondent to costs, penalties, and/or punitive
8 damages for any costs incurred by the Department or other government agencies as
9 a result of such failure, as provided by HSC section 25188 and other applicable
10 provisions of law.

11 3.16. Parties Bound: This Order shall apply to and be binding upon
12 Respondent, and its officers, directors, agents, employees, contractors,
13 consultants, receivers, trustees, successors, and assignees, including but not
14 limited to individuals, partners, and subsidiary and parent corporations, and
15 upon any successor agency of the State of California that may have
16 responsibility for and jurisdiction over the subject matter of this Order.

17
18 PENALTY

19
20 4. Based on the foregoing DETERMINATION OF VIOLATIONS, the Department sets
21 the amount of Respondent's total proposed penalty at \$62,300.00.

22
23 RIGHT TO A HEARING

24
25 5. You may request a hearing to challenge the Order and Complaint. Appeal
26 procedures are described in the attached Statement to Respondent.

1
2
3 EFFECTIVE DATE

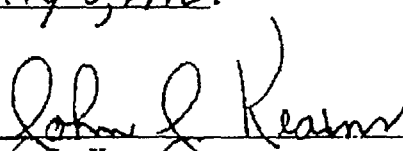
4 6.1. This Order and Complaint is final and effective ten days from the date
5 it is served to you, unless you request a hearing within the ten-day period.

6 6.2. Orders setting penalties issued under HSC section 25189.3 become
7 effective and final upon issuance after a hearing or waiver of hearing.
8

9 TIME PERIODS
10

11 7. "Days" for purposes of this Order and Complaint means calendar days.
12

13 Date of Issuance February 6, 1990.
14

15 
16 John J. Kearns
17 Regional Administrator
Toxic Substances Control Program
Department of Health Services

18 cc: Val Siebel
19 Regional Administrator
20 Region 1
10151 Croydon Way
Sacramento, CA 95827

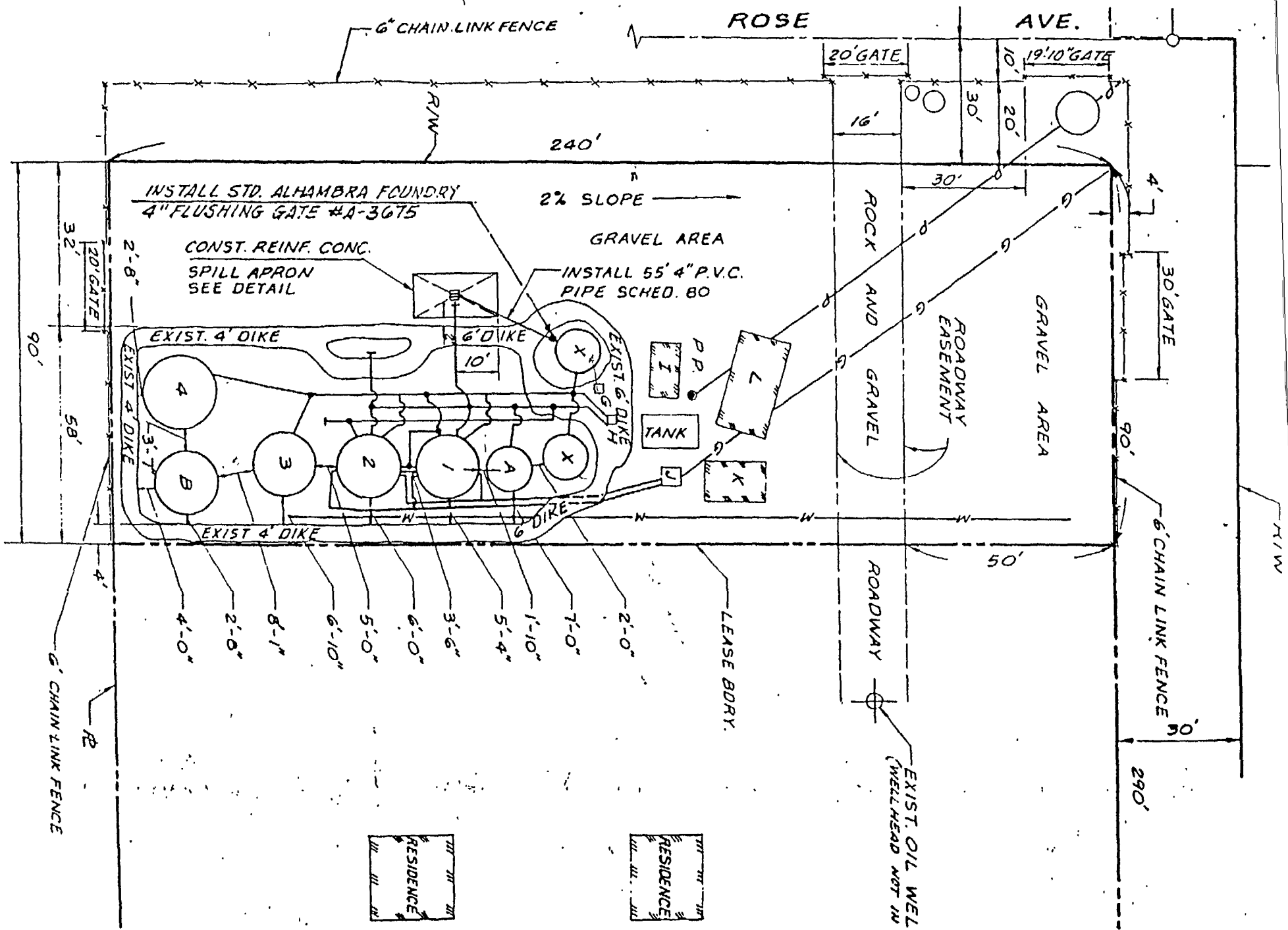
21 Howard Hatayama
22 Regional Administrator
23 Region 2
700 Heinz Avenue
Berkeley, CA 94710

24 Dennis Dickerson
25 Regional Administrator
26 Region 3
1405 San Fernando Blvd., Suite 300
Burbank, CA 91504
27

PLAN

5 of 5

ATTACHMENT 2



Facility: Dico Oil Company
1845 E. Willow Street
Signal Hill, CA 90806

Interim Status Document

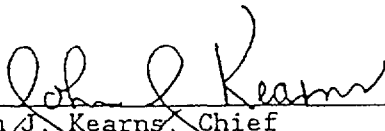
Number: CAD 980737076

Operator: Dico Oil Company
2700 Rose Avenue, Suite "K"
Signal Hill, CA 90806

Owner: Bianca Denny
2627 Gardenia Avenue
Signal Hill, CA 90806

Effective Date: March 29, 1989

Pursuant to Section 25200.5 of the California Health and Safety Code, this Interim Status Document is hereby granted to Dico Oil Company/Ms. Bianca Denny subject to the conditions set forth herein.



John J. Kearns, Chief
Region 4 (Long Beach)
Toxic Substances Control Division

3/29/89

Date

Interim Status Document
Dico Oil Company
1845 E. Willow Street
Signal Hill, CA 90806
CAD 980737076

GENERAL CONDITIONS

The Owner/Operator shall comply with all applicable provisions of Chapter 6.5 and 6.8 of Division 20 of the California Health and Safety Code (H&SC), and all rules, regulations, permits, covenants, standards, requirements, or orders issued, promulgated, or executed thereunder and any amendments thereto, including the Minimum Standards for Management of Hazardous and Extremely Hazardous Waste, Chapter 30, Division 4, Title 22 of the California Code of Regulations (CCR).

The Owner/Operator shall comply with the conditions of this document and with any new or modified conditions which the California State Department of Health Services (DHS) deems necessary to protect public health or the environment. A new interim status condition or a modification of an existing interim status condition shall become effective on the date that written notice of such change is received by the Owner/Operator. Inclusion of specific State requirements in this document shall not be construed to mean that only these requirements apply to the Owner/Operator or to the Facility and shall not exempt the Owner/Operator from complying with any other applicable federal, state or local requirements.

In the event of conflict among the provisions of the applicable laws, regulations, requirements and this document, the most stringent will apply.

The Owner/Operator shall provide and maintain financial responsibility in accordance with Article 17, Chapter 30, Division 4 of the CCR. Documentation of financial responsibility compliance shall be provided by the Owner/Operator of the Facility to the Department within sixty days of issuance of the Interim Status Document.

Specific Conditions

1. The Facility is only authorized to receive, store, treat or recycle:
 - a. Used oil as defined in Section 25250.1(a) of the H&SC.
 - b. Waste oil or slop oil.
 - c. Diesel and jet fuels.

2. During Interim Status, the Owner/Operator shall comply with the Interim Status Standards codified in Article 17 through 32 of the CCR and Article 13, Chapter 6.5, Division 20, H&SC.
3. Treatment at the facility other than heat enhanced gravity separation is prohibited.

This document shall remain in effect until issuance of a final permit, or until revoked by the Department.



GLOBAL
GEOCHEMISTRY
CORPORATION

TELEX: 194449 LSA ATTN: GGC

6919 ETON AVENUE • CANOGA PARK • CALIFORNIA 91303-2194

(818) 992-4103

Client: Precision Tank

WO#: 4024

project: Pan Transportation
Gardenia st.

Date: 06-17-88

ANALYSIS OF TOTAL PETROLEUM HYDROCARBONS IN SOIL SAMPLES

1. Sample Background.

Four soil samples were collected by Precision Tank on 06-15-88, received by Global Geochemistry on 06-15-88, and analyzed on 06-16-88. Samples were stored at 4 °C prior to analysis.

2. Summary of Analytical Procedures.

Soil samples were analyzed for total petroleum hydrocarbons by EPA 418.1 analytical method.

3. Results:

EPA 418.1

GGC#	Sample I.D.	Sample Wt. (gm)	Moisture Content (%)	Total Petroleum Hydrocarbons (ug/g dry soil)
------	-------------	--------------------	-------------------------	--

Method Blank	-	-	-	nd
3902	1-14.5'	27.2	10.7	22.5
3903	2-12.5'	27.6	9.6	27.1
3904	3-10.0'	22.5	7.5	945.3
3905	4-15.5'	24.0	8.1	19.7

Detection Limit:	5.0
------------------	-----

Analyst Ru-Po Lee Supervisor [Signature]

Please print or type (Form designed for use on elite (12 pitch typewriter))

UNIFORM HAZARDOUS WASTE MANIFEST

GENERATOR

TRANSPORTER

FACILITY

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No CA100000151218910		Manifest Document No 11111		2 Page 1 1 of 1		Information in the shaded areas is not required by Federal law.			
3 Generator's Name and Mailing Address Dico Oil Company 2700 Rose Ave Sacramento, CA 95811						A State Manifest Document Number 88576688					
4 Generator's Phone (217) 437-7211						B State Generator's ID HIFH0381010103107					
5 Transporter 1 Company Name Delco, Inc.			6 US EPA ID Number CA100000151218910			C State Transporter's ID 007724-0072			D Transporter's Phone (619) 474-7511		
7 Transporter 2 Company Name			8 US EPA ID Number			E State Transporter's ID			F Transporter's Phone		
9 Designated Facility Name and Site Address Neko Oil Refinery 600 West 1st St Napa, CA 94558						10 US EPA ID Number CA100000151218910			G State Facility's ID HIFH038101010310811		
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No Type		13 Total Quantity		14 Unit Wt/Vol	
a						1		1		State 221	
b						1		1		State EPA/Other	
c						1		1		State EPA/Other	
d						1		1		State EPA/Other	
J Additional Descriptions for Materials Listed Above water 99% oil 1%						K Handling Codes for Wastes Listed Above a 01 b c d					
15 Special Handling Instructions and Additional Information											
16 GENERATOR'S CERTIFICATION I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment OR, if I am a small quantity generator I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name J. L. Lutz						Signature			Month Day Year 11/1/88		
17 Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name E. L. Lutz			Signature		
18 Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name			Signature		
19 Discrepancy Indication Space						20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19					
Printed/Typed Name						Signature			Month Day Year		

CONTINGENCY PLAN

DESCRIPTION

NAME: DICO OIL COMPANY

ADDRESS: 1845 E. Willow St., P.O. Box 7654

CITY: Signal Hill STATE: CA. ZIP: 90806

PHONE: (213) 427-9811 or (213) 427-6074

This plan describes the actions the facility personnel must take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste of hazardous waste or hazardous constituents into the air, soil or surface water at the facility, facility personnel should immediately notify one or more of the following emergency coordinators:

Richard Cowan	Primary Emergency Coordinator	Office: (213) 427-9811 Home: (714) 730-7174
Junior D. Cutbirth	Alternate	Office (213) 427-9811 Home: (213) 595-5718

If neither of these people are available, facility personnel should, where necessary, activate the alarm, evacuate the premises and notify the listed authorities.

The arrangements agreed to by local and State of California fire, police, hospital, and emergency response officials for emergency service coordination include:

Persons to be Notified

1. John J. Kearns Hazardous Materials Manager
245 W. Broadway
City of Long Beach Health Department
(213) 590-5931

Agencies to be Notified

Police	City of Signal Hill	(213) 426-7311
Fire/Emergency	City of Signal Hill County of Los Angeles	911 (213) 265-2706
Hospital	Pacific Hospital	(213) 595-1911
Local Regulatory Agency	Long Beach Health Dept.	(213) 422-4885
Federal Regulatory Agency	CA. Dept. of Health Services	(213) 620-4460
National Response Center	US Coast Guard	(800) 424-8802

Emergency Equipment of Use

<u>Physical Description</u>	<u>Location</u>	<u>Capabilities</u>
Fire Extinguishers (Dry Chemical)	Within the firewall	Class B, C, D
Water Hoses	At heater and South end inside firewall	
Telephone	In lab at plant	
Wireless telephone	Hand held by plant operator	
Compressed Air-Powered Horns	Westside, firewall	
2 Pump Trucks	Adjacent to loading/ unloading pad-accessible 24 hours a day	
2 Water Tanks	Northwest corner of loading/ unloading pad	2,000 gallons

SPECIFIC PROCEDURES

- A. Interior tank ruptures on spill:
 - 1) Close off any connecting lines on vessels
 - 2) initiate fluid recovery into available tankage;
if liquid escapes firewall notify local governmental agencies
 - 3) initiate environmental remediation as necessary
- B. Exterior tank rupture or spill
 - 1) shut down all pumps (plant and/or tanker)
 - 2) shut down operating pumps
 - 3) initiate fluid recovery with plant pumps and pump trucks
 - 4) block any avenues of fluid escape
 - 5) notify appropriate agencies
 - 6) initiate environmental remediation
- C. Fire or Explosion
 - Minor:
 - 1) close off any connecting lines if it can be done safely
 - 2) use available fire fighting equipment
 - 3) contact appropriate agencies
 - Major:
 - 1) close off any connecting lines
 - 2) contact fire department
 - 3) contact appropriate agencies

CONTINGENCY PLAN UPDATE

An up-to-date copy of the Contingency Plan will be maintained at the facility. Copies will also be distributed to the Emergency Coordinator, the City of Signal Hill, Police, County Fire Department, Public Health and Public Works Departments, the State Regional Water Quality Control Board and State Department of Health Services.

AMENDMENT OF PLAN

The Contingency Plan will be reviewed and immediately amended, if the following occurs:

- a. The facility permit is revised.
- b. The plan fails in an emergency.

- c. The facility design, construction, operation, maintenance or other conditions change in a way that materially increases the potential for fires, explosions, releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency.
- d. The Emergency Coordinator changes or;
- e. The list of emergency equipment changes.

All affected agencies and emergency facilities will be provided with the revised plan immediately.

RESPONSIBILITIES OF THE EMERGENCY COORDINATOR.

1. Availability. The Primary Emergency Coordinator will be available at all times to handle emergency procedures. He will be located onsite during hours of operation. If the facility is closed, or he is not at the site, the Primary Emergency Coordinator or the Alternate Emergency Coordinator will be placed on-call, so that in the event of an emergency, one of them may be contacted immediately.

The Emergency Coordinator shall be thoroughly familiar with all aspects of the facility's Contingency Plan, all operations and activities at the facility, the location and characteristics of wastes handled, the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to carry out the Contingency Plan.

2. Responsibility in an Emergency. The Emergency Coordinator at Dico Oil Company is responsible for coordinating all emergency response measures at the facility.

- a. Notification. Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (or those designated by the Emergency Coordinator) will immediately:

1. Notify all facility personnel via the public address and alarm systems;
2. Notify appropriate state and local agencies with designated response roles, if their help is needed.

- b. Identification of Released Material. The Emergency Coordinator will provide immediate information including a description of the character, source, amount and extent of released materials.
- c. Assessment of Health Effects. Concurrently, the Emergency Coordinator will assess the possible hazards to human health or the environment caused by fire, explosion or released materials. The assessment will consider the direct and indirect effects of the fire or explosion and agents used to control fires or explosions.
- d. Offsite Health Effects. Should the emergency threaten human health or the environment offsite, the Emergency Coordinator will report the findings as follows:
 - 1. If evacuation is required, the County of Los Angeles Fire Department is notified, and
 - 2. The Fire Department is notified of the following:
 - (1) Name of reporter;
 - (2) Telephone number of reporter;
 - (3) Name of facility;
 - (4) Address of facility;
 - (5) Time of incident;
 - (6) Type of incident (e.g., fire);
 - (7) Name of material(s) involved;
 - (8) Quantity of material(s) involved;
 - (9) Extent of injuries, if any; and
 - (10) Possible hazards to offsite health or environment.
- e. Prevention of Spread or Recurrence of Emergency. It is the responsibility of the Emergency Coordinator to take all reasonable measures to ensure that the incident does not spread to other areas. He must also maintain surveillance of other areas of the facility to ensure that they are not affected by pressure build-up in pipes, leaks, gas generation in other areas, etc. Appropriate monitoring will be initiated to ensure this.
- f. Monitoring. If the facility stops operations in response to an emergency condition, the Emergency Coordinator will monitor the affected areas/facilities for imminent hazards.

- g. Treatment, Storage, and Disposal of Affected Materials. After the emergency is over, the Emergency Coordinator will immediately provide for cleanup, treatment, storage and disposal of any recovered waste, contaminated soil, and/or contaminated surface waters.
- h. Steps Taken Prior to Facility Start-up. The Emergency Coordinator shall ensure that, in the affected area(s) of the facility:
 - 1. No waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed;
 - 2. All emergency equipment is cleaned and fit for its intended use before operations are resumed;
 - 3. The DOHS and appropriate State and local authorities are notified and the facility is in compliance before operations are resumed in the affected area(s) of the facility.

RESPONSIBILITIES OF THE FACILITY OPERATOR

- 1. Notification. The facility operator will notify the DOHS and local authorities that any cleanup resulting from an emergency is complete before the facility resumes operation.
- 2. Operation Record. If the Contingency Plan is implemented, the facility operator will record in the Operating Record the date, time, and details of any incident.
- 3. Incident Report. Should an emergency occur at the facility, a written report of the incident will be submitted to the DOHS within 5 days. The following information will be included in the report.
 - a. Name, address, and telephone number of owner or operator;
 - b. Name, address, and telephone number of facility;
 - c. Date, time, and type of incident;
 - d. Name and quantity of material(s) involved;

- e. Extent of injuries, if any;
- f. Assessment of actual or potential health or environmental hazards, if applicable; and
- g. Estimated quantity and disposition of recovered material resulting from the incident.

Evacuation

The signal to evacuate the premises will be sounding of the alarm system, compressed air signal horns. The signal for emergency will be a horn blast every 10 seconds. The signal for emergency evacuation will be two consecutive horn blasts every 10 seconds.

Primary evacuation of the site will be at the main entrance gate, on 27th Street. Alternate evacuation routes are:

two entrance/exit gates located on Rose Avenue;

two exits, leading to private property, on the east side of the facility.